

Plaintiff,
PAMELA MOSES
Pro SE

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US District Court
Western District

THOMAS M. COULD
CLERK, U.S. DISTRICT COURT
W.D. OF TN, MEMPHIS

PAMELA MOSES

Plaintiff,

v.

**Pier One Imports Inc., STEPHANIE
DILDAY and Jane Doe, Jon Doe,
Buisness License #200937 DOES 1- 43,
Inclusive**

Defendants.

CASE NO. 2:12cv-02441-jfm-dkv

**COMPLAINT FOR DAMAGES FROM
VICARIOUS LIABILITY,
HARRASSMENT, DEFAMATION,
FALSE IMPRISONMENT, MALICIOUS
PROSECUTION, EMOTIONAL
DISTRESS, AND DISCRIMINATION;
AND FOR PUNITIVE DAMAGES**

DEMAND FOR JURY TRIAL

Motion To Ammend Complaint

Comes now the plaintiff, Pamela Moses, by and through herself pro se in the above entitled cause, respectfully request leave of court to amend the complaint filed on May 3rd 2012 in which plaintiff plaintiff's respectfully prays that this court enter judgment granting plaintiff :

- (a) Will accept jurisdiction of this complaint.
- (b) Will issue service of process upon all the defendants with deliberate speed.
- (c) Award reasonable attorney fees to the plaintiff.
- (d) Plaintiff hereby demand a jury trial on all trialable issues.
- (e) Allow plaintiff to further amend complaint upon identity of real Jon & Jane Doe(s).

- (f) Award Plaintiff punitive damages in the amount of \$1,000,000 (one million dollars) against the defendants
- (g) Award plaintiff compensatory damages in the amount of \$500,000 (five hundred thousand dollars) against the defendants.
- (h) Award cost of this action to the plaintiff.
- (i) Award such other and further relief as this Court may deem appropriate.

Grounds for this motion are as follows:

1. Plaintiff was deprived the right to be accommodated in a public place. Pursuant to 42 USC § 12182 - No individual shall be discriminated against on the basis of disability in the full and equal enjoyment of the goods, services, facilities, privileges, advantages, or accommodations of any place of public accommodation by any person who owns, leases (or leases to), or operates a place of public accommodation.
2. Plaintiff is African American and because of denial of public accommodations Diversity of Citizenship Pursuant to 42 USC §1332 prohibition against discrimination on the grounds of race, color, & religion or national origin.
3. Plaintiff was falsely imprisoned and robbed of life & liberty.

JURISDICTION

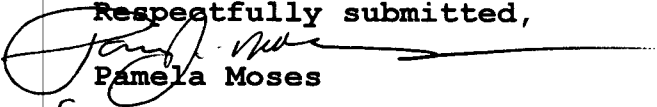
1. This complaint is brought pursuant to 42 U. S. C 1983. The basis for jurisdiction in this action is therefore proper pursuant to 14th amendment.
2. This complaint is brought pursuant to 28 USC 1332 § 574. Actions for damages arising out of alleged unlawful arrest of individual by deputy United States pursuant to 28 USC §1332 574 also case law **Clark v. Snow,**

469 F.Supp. 1028, 1029 (D.D.C. 1979); *Jones v. District of Columbia*, 424
F.Supp. 110 (D.D.C. 1977)

Wherefore, Plaintiff now moves the court to amend the motion previously
filed with this court on 05/03/2012 in which the following relief was
requested.

08/31/2012

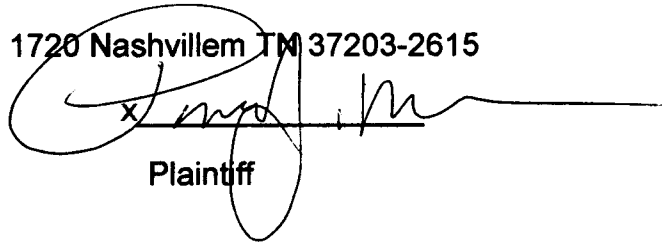
Respectfully submitted,


Pamela Moses

(731) 394-2126

Certificate of Service

I declare under penalty of perjury and certify that a true and exact copy of the forgoing is true and correct pursuant to 28 U. S. C. 1746 has been mailed to the attorney of Pier 1 Imports this day of September 10th 2012. To: Cyrus Booker Gonzalez Saggio & Harlan LLP 1720 Nashville TN 37203-2615



Plaintiff